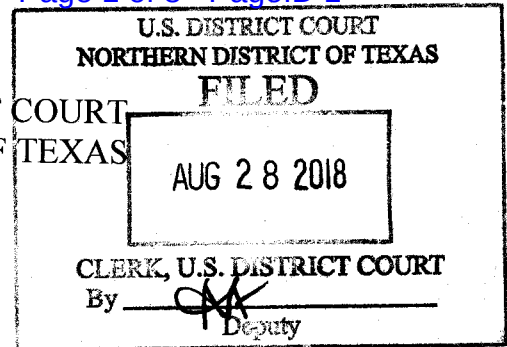


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA

NO.

v.

DEMOUSHAE NATASSAJAE-SO
FINE MARSH (01)
TASHONNA LENELL MARSH (02)

PSN DESIGNATED

3-18CR-422-B

INDICTMENT

The Grand Jury charges:

Count One

Acquiring a Firearm from a Licensed Firearms Dealer
by False or Fictitious Statements; Aiding and Abetting
(Violation of 18 U.S.C. § 922(a)(6))

On or about April 16, 2018, in the Dallas Division of the Northern District of Texas, the defendant, **Demoushae Natassajae-So Fine Marsh**, in connection with the acquisition of a firearm, to wit: a Glock, model 19X, 9 millimeter pistol, bearing serial number BGYR238, from Academy Sports and Outdoors in Mesquite, Texas, a licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United States Code, knowingly made a false and fictitious written statement to Academy Sports and Outdoors, which statement was intended and likely to deceive Academy Sports and Outdoors, as to a fact material to the lawfulness of such sale of said firearm to **Demoushae Natassajae-So Fine Marsh** under Chapter 44 of Title 18, United States Code, in that **Demoushae Natassajae-So Fine Marsh** did execute a Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF") Form 4473, Firearms Transaction Record, to

the effect that she was the actual buyer of said firearm, when in fact, as **Demoushae Natassajae-So Fine Marsh** then knew, she was not the actual buyer of the firearm.

In violation of 18 U.S.C. § 922(a)(6), the penalty for which is found at 18 U.S.C. § 924(a)(2).

Count Two

False Statement with Respect to Information Required
to be Kept in Records of a Licensed Firearms Dealer
(Violation of 18 U.S.C. §§ 924(a)(1)(A))

On or about April 16, 2018, in the Dallas Division of the Northern District of Texas, the defendant, **Demoushae Natassajae-So Fine Marsh**, knowingly made a false statement and representation to Academy Sports and Outdoors, a licensed dealer under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Academy Sports and Outdoors, in that **Demoushae Natassajae-So Fine Marsh** did execute a Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) Form 4473, Firearms Transaction Record, to the effect that she was the actual buyer of a firearm, to wit: a Glock, model 19X, 9 millimeter pistol, bearing serial number BGYR238, when in truth and in fact, she was not the actual buyer of the firearm.

In violation of 18 U.S.C. § 924(a)(1)(A).

Count Three
Acquiring a Firearm from a Licensed Firearms Dealer
By False or Fictitious Statements
(Violation of 18 U.S.C. § 922(a)(6))

On or about April 16, 2018, in the Dallas Division of the Northern District of Texas, the defendant, **Tashonna Lenell Marsh**, in connection with the acquisition of a firearm, to wit: a Glock, model 43, 9 millimeter pistol, bearing serial number BEMZ185, from Academy Sports and Outdoors in Mesquite, Texas, a licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United States Code, knowingly made a false and fictitious written statement to Academy Sports and Outdoors, which statement was intended and likely to deceive Academy Sports and Outdoors, as to a fact material to the lawfulness of such sale of said firearm to **Tashonna Lenell Mars** under Chapter 44 of Title 18, United States Code, in that **Tashonna Lenell Mars** did execute a Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) Form 4473, Firearms Transaction Record, to the effect that she was the actual buyer of said firearm, when in fact, as **Tashonna Lenell Mars** then knew, she was not the actual buyer of the firearm.

In violation of 18 U.S.C. § 922(a)(6), the penalty for which is found at 18 U.S.C. § 924(a)(2).

Count Four

False Statement with Respect to Information Required
to be Kept in Records of a Licensed Firearms Dealer
(Violation of 18 U.S.C. § 924(a)(1)(A))

On or about April 16, 2018, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Tashonna Lenell Marsh**, knowingly made a false statement and representation to Academy Sports and Outdoors, a licensed dealer under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Academy Sports and Outdoors, in that **Tashonna Lenell Marsh** did execute a Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) Form 4473, Firearms Transaction Record, to the effect that she was the actual buyer of a firearm, to wit: a Glock, model 43, 9 millimeter pistol, bearing serial number BEMZ185, when in truth and in fact, she was not the actual buyer of the firearm.

In violation of 18 U.S.C. § 924(a)(1)(A).

Forfeiture Notice
(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))


Upon conviction for the offense alleged in Counts One through Four of this Indictment, and pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), the defendants **Demoushae Natassajae-So Fine Marsh** and **Tashonna Lenell Marsh** shall forfeit to the United States of America any firearm and ammunition involved in the respective offense, including but not limited to the following:

1. a Glock, model 19X, 9 millimeter pistol, bearing serial number BGYR238;
2. a Glock, model 43, 9 millimeter pistol, bearing serial number BEMZ185; and
3. any ammunition recovered with the above firearms.

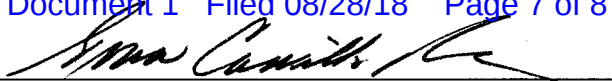
A TRUE BILL:


FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY



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UNITED STATES MAGISTRATE JUDGE
No Criminal Matter Pending

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

DEMOUSHAE NATASSAJAE-SO
FINE MARSH (01)

TASHONNA LENELL MARSH (02)

INDICTMENT

18 U.S.C. §§ 922(a)(6)

Acquiring a Firearm from a Licensed Firearms Dealer
By False or Fictitious Statements; Aiding and Abetting
(Count 1 and 3)

18 U.S.C. §§ 924(a)(1)(A)

False Statement with Respect to Information Required
to be Kept in Records of a Licensed Firearms Dealer
(Count 2 and 4)

18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)
Forfeiture Notice

4 Counts

A true bill rendered

DALLAS


FOREPERSON

Filed in open court this 28th day of August, 2018.

Warrant to be Issued
